

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION  
Civil Action No.: 3:24-cv-00900-MOC-SCR

DANIELLE RUIZ, JANET GUZMAN, )  
KEELEY REBECCA HAZELL, MARIANA )  
DAVALOS, ROSA ACOSTA, STEPHANIE )  
RAO, PAOLA CAÑAS, and JAMILLETTE )  
GAXIOLA, )

Plaintiffs, )

v. )

QC PRESS CLUB, LLC. d/b/a BROOKLYN )  
NIGHTCLUB AND LOUNGE and )  
KIMBERLY N. DOLLAR, )

Defendants. )

**STIPULATION OF DISMISSAL**  
**OF DEFENDANT KIMBERLY N.**  
**DOLLAR**

The parties to the above-entitled action, pursuant to the provision of Fed. R. Civ. P. 41(a)(1)(A)(ii), hereby stipulate that the claims of the Plaintiffs: Danielle Ruiz, Janet Guzman, Keeley Rebecca Hazell, Mariana Davalos, Rosa Acosta, Stephanie Rao, Paola Cañas, and Jamillette Gaxiola (collectively “Plaintiffs”) against the Defendant KIMBERLY N. DOLLAR, have been dismissed without prejudice and without costs or fees.

This stipulation of dismissal will have no effect on the claims of Plaintiffs against Defendant QC PRESS CLUB, LLC d/b/a BROOKLYN NIGHTCLUB AND LOUNGE.

Respectfully submitted this November 25, 2024.

**THE CASAS LAW FIRM, P.C.**

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing document has been electronically filed with the Clerk of Court using the CM/ECF system, which system will automatically generate and send a Notice of Electronic Filings to the undersigned filing user and registered users of record in the matter, as follows:

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This 25<sup>th</sup> day of November 2024.

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